

Peter Goldstein [SBN 6992]
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Attorney for Plaintiffs
ROCHELLE SCOTT, individually, and as co-special
administrator of the estate of ROY ANTHONY SCOTT;
and FREDRICK WAID, as co-special administrator
of the estate of ROY ANTHONY SCOTT

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA (LAS VEGAS)

ROCHELLE SCOTT, individually, and as co-special
administrator of the estate of ROY ANTHONY
SCOTT; and FREDRICK WAID, as co-special
administrator of the estate of ROY ANTHONY
SCOTT,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; KYLE SMITH, individually;
THEODORE HUNTSMAN, individually; and DOES
1-10, inclusive,

Defendants.

Case No. 2:20-cv-01872-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
PLAINTIFFS TO FILE RESPONSE TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT [ECF No. 19]**

(Second Request)

Plaintiffs, ROCHELLE SCOTT, individually, and as co-special administrator of the estate of ROY ANTHONY SCOTT and FREDRICK WAID, as co-special administrator of the estate of ROY ANTHONY SCOTT and Defendants LAS VEGAS METROPOLITAN POLICE DEPARTMENT, KYLE SMITH and THEODORE HUNTSMAN (collectively hereinafter the "PARTIES"), by and through their counsel of record, submit this Stipulation and Order to Extend Deadline for Plaintiffs' to File their Response to Defendants' Motion for Summary Judgment [ECF No. 19] (Second Request) as follows:

///

I. **PROCEDURAL HISTORY**

1. On February 7, 2022, LVMPD Defendants filed their Motion for Summary Judgment [ECF No. 19].
2. On February 8, 2022, Plaintiffs submitted and were granted a first extension of time to file their Response to Defendants' Motion for Summary Judgment [ECF No. 19], to March 21, 2022.
3. Between February 9 – February 25, 2022, Plaintiff's counsel has been in extensive depositions in three separate cases, a mediation, and in a jury trial from February 28, 2022 until March 4, 2022 in *Vasquez-Brenes v. LVMPD, et al.*, A-17-752742-C.
4. In addition, the undersigned will be out of the office taking depositions in Reno, Nevada the week of March 14 - 18, 2022.

II. **STIPULATION AND ORDER**

Based upon the above, the parties hereby STIPULATE TO THE FOLLOWING:

1. Plaintiffs' Response to Defendants' Motion for Summary Judgment {ECF No. 19} would be extended from March 21, 2022 to **April 5, 2022**.

IT IS SO STIPULATED this 8th day of March, 2022.

PETER GOLDSTEIN LAW CORP


MARQUIS AURBACH COFFING

By: /s/ Peter Goldstein
Attorney for Plaintiffs ROCHELLE SCOTT, individually, and as co-special administrator of the estate of ROY ANTHONY SCOTT; and FREDRICK WAID, as co-special administrator of the estate of ROY ANTHONY SCOTT

By: /s/ Craig R. Anderson
CRAIG R. ANDERSON
Attorneys for Defendants LAS VEGAS METROPOLITAN POLICE DEPARTMENT; KYLE SMITH and THEODORE HUNTSMAN

IT IS SO ORDERED

DATED this 10th day of March, 2022.


RICHARD E. BOULWARE, II
United States District Court

CERTIFICATE OF SERVICE

I am employed in the County of Clark, State of Nevada. I am over the age of eighteen years and not a party to the within action; my business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

I hereby certify that on this 9th day of March, 2022, a true and correct copy of the following document **STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFFS TO FILE RESPONSE TO DEFENDANTS' SUMMARY JUDGMENT MOTION [ECF no. 19] (Second Request)** was served by electronically filing with the Court's CM/ECF electronic filing system to the following parties:

Craig R. Anderson, Esq.
MARQUIS AURBACH COFFING
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
Email: canderson@maclaw.com
SMong@maclaw.com
Attorney for Defendants
Las Vegas Metropolitan Police Department,
Kyle Smith and Theodore Huntsman

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

By: 
An Employee of Peter Goldstein Law Corp



Peter Goldstein <pglawstaff@petergoldsteinlaw.com>

SCOTT - Stipulation and Order to Extend Deadline for Plts' Response to MSJ [19]

3 messages

Kris Bechtold <pglawstaff@petergoldsteinlaw.com>

Tue, Mar 8, 2022 at 1:34 PM

To: Craig Anderson <canderson@maclaw.com>, Sherri Mong <smong@maclaw.com>

Cc: Peter Goldstein <peter@petergoldsteinlaw.com>

Bcc: Peter Goldstein <pglawstaff@petergoldsteinlaw.com>, Jeremy Friedman <friedman313@gmail.com>

Hi - Attached please find a Stipulation and Order to Extend Deadline for Plaintiffs' Response to Defendants' MSJ [19] (Second Request) for your review. Please let us know of any changes and/or if you agree to affix your signature.

Thank you,

Kris Bechtold

Legal Assistant



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SAO re extend time to file response to MSJ [019].doc

66K

Craig Anderson <canderson@maclaw.com>

Tue, Mar 8, 2022 at 3:30 PM

To: Kris Bechtold <pglawstaff@petergoldsteinlaw.com>, Sherri Mong <SMong@maclaw.com>

Cc: Peter Goldstein <peter@petergoldsteinlaw.com>

Fine with me



Craig R. Anderson, Esq.

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Marquis Aurbach - Attorneys at Law

From: Kris Bechtold <pglawstaff@petergoldsteinlaw.com>

Sent: Tuesday, March 8, 2022 1:35 PM

To: Craig Anderson <canderson@maclaw.com>; Sherri Mong <SMong@maclaw.com>

Cc: Peter Goldstein <peter@petergoldsteinlaw.com>

Subject: [External] SCOTT - Stipulation and Order to Extend Deadline for Plts' Response to MSJ [19]

Hi - Attached please find a Stipulation and Order to Extend Deadline for Plaintiffs' Response to Defendants' MSJ [19] (Second Request) for your review. Please let us know of any changes and/or if you agree to affix your signature.

Thank you,

Kris Bechtold

Legal Assistant

[Redacted signature block]

[Quoted text hidden]

Peter Goldstein <peter@petergoldsteinlaw.com>

To: Craig Anderson <canderson@maclaw.com>

Cc: Kris Bechtold <pglawstaff@petergoldsteinlaw.com>, Sherri Mong <SMong@maclaw.com>

Tue, Mar 8, 2022 at 3:31 PM

Thanks Craig, will get filed tomorrow first thing.



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